UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JOHN GORMAN,

Plaintiff,

- against - Civil Case No.: 1:14-cv-434

RENSSELAER COUNTY, SHERIFF JACK MAHAR, ANTHONY PATRICELLI, UNDERSHERIFF PATRICK RUSSO, COUNTY HUMAN RESOURCES MANAGER TOM HENDRY, COUNTY EXECUTIVE KATHLEEN JIMINO,

Defendants.

STENOGRAPHIC MINUTES OF EXAMINATION BEFORE TRIAL conducted of Non-Party Witness, JEFFERY RANKEN, held on the 24th day of September, 2015 at the Law Office of Patrick Sorsby, 1568 Central Avenue, Albany, New York, commencing at 10:55 a.m., before Diane Daly-Gage, a Shorthand Reporter and Notary Public in and for the State of New York.

APPEARANCES:

ON BEHALF OF PLAINTIFF:

LAW OFFICE OF PATRICK SORSBY, PLLC
1569 Central Avenue
Albany, New York 12205
518.545.4529
BY: PATRICK SORSBY, ESQ.

ON BEHALF OF DEFENDANTS and WITNESS:

MARTIN & RAYHILL, P.C.
421 Broad Street, Suite 10
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BY: KEVIN G. MARTIN, ESQ.
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ALSO PRESENT:

John Gorman

S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and amongst the attorneys for the respective parties hereto, that filing, sealing and certifications are hereby waived;

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to the form of the question, shall be reserved to the time of the trial;

IT IS FURTHER STIPULATED AND AGREED that the within Deposition may be signed before any Notary Public with the same force and effect as though subscribed and sworn to before this Court.

*** *** ***

P-R-O-C-E-E-D-I-N-G-S

JEFFERY RANKEN,

(having been first duly sworn by the Notary Public, was examined and testified as follows:)

EXAMINATION

BY MR. SORSBY:

Q Mr. Ranken, thank you for coming today. Were you able to hear some of the instructions I gave the last deponent?

A Yes.

Q All right. I'm going to go ahead and repeat them. The stenographer cannot record if you shake your head yes or no. You'll have to verbalize your response to my questions. If my questions aren't clear, please ask me to repeat the question because I want to make sure you're answering the question that I'm posing to you. From time to time your attorney may object to the form of the question. You'll still have to answer the question, but he's just recording for the record his objection to the form of my question. And I may repeat the question to make sure the form is correct. If at any time you need to take a break, please let me know and we can take a break. If you need water, there's water.

Other than that do you have any questions in regards to my instructions?
A No.
Q Can you give us a little background, Mr. Ranken? Can you tell us who you're currently employed with?
A Rensselaer County Sheriff's Office.
Q And how long have you been employed there?
A A little over 18 years.
Q In what capacity are you employed right now?
A As a lieutenant, operational lieutenant.
Q And how long have you had that position?
A About a year and a half.
Q And what position did you have before that?
A I was a correctional sergeant.
Q And how long were you in that position?
A I think I was a sergeant for probably about seven or eight years.
Q And were you a sergeant during Mr. Gorman's employment?
A Yes.
Q Can you just briefly tell us what education you have, Mr. Ranken? Do you have like a college degree?
A I have a two-year degree, yes.

Q And what is that in?
A It's in individual studies.
Q Where did you get that from?
A Hudson Valley Community College.
Q Before you were a sergeant what position did you hold?
A I was a corporal.
Q And then before that?
A Before that I was an officer.
Q Because I'm not familiar with the chain of command at the jail, did you say an operational...
A Operational lieutenant, yes.
Q Lieutenant. Okay. And you have supervisory capacity?
A Yes.
Q How many people do you supervise right now?
A Right now I supervise the B-line shift.
Q Okay.
A There is 30 officers each day and four sergeants each day assigned to that shift.
Q In your prior capacity as a sergeant did you have a supervisory role at that time as well?
A Yes.
Q And how many people did you supervise at that time?

A Approximately the same number. I was a watch commander on the B-line shift.
Q Can you tell us the responsibilities of a watch commander?
A Just overall duties, assigning job assignments, and making sure everybody is doing their job.
Q You said a watch commander for the B-line shift. What's a B-line shift?
A B-line shift is days, which is seven to 3:30 or 7:30 to 3:30.
Q Now, is this the shift that Mr. Gorman was on?
A Yes.
Q Did you have a particular office as watch commander?
A We share an office, yes. Watch commanders all share the same office.
Q Where was that?
A It was near the central control room.
Q And is that in the protected part of the jail?
A It's in the secured part. Yes.
Q Secured part. Okay. Now, as the watch commander were you responsible for the safety of all of the prisoners under your command or in the facility at that time?
A Yes.

Q And were you responsible for all of the corrections officers as well?
A Yes.
Q Okay. That would include their safety as well?
A Yes.
Q Okay. Did anybody -- as the watch commander was there anybody that functioned -- that shared your duties in regards to the facility?
A There would've been three other sergeants who would've been assigned to the shift with me.
Q Okay. And did they work under you in that regard?
A Yes.
Q All right. And in the chain of command who did you report to?
A I reported to Captain Hal Smith.
Q So I want to just direct your attention back to October of 2012.
A Okay.
Q And do you recall having conversation with Mr. Gorman in regards to a phone call that Mr. Gorman had received from an Anthony Patricelli?
A I remember hearing about it. I don't remember if I heard it from John or where I heard it, but I do remember hearing about that.

Q Okay. Do you remember -- now, we're talking about the same October again of 2013. Do you remember Mr. Gorman -- did Mr. Gorman come to you and make a report about a threatening phone call?
A I don't remember that.
Q Okay. When do you remember hearing for the first time about the threatening phone call from Mr. Patricelli to Gorman?
A I don't remember a particular date. I remember hearing about it. But as far as a date I couldn't tell you.
Q Okay. And you don't remember who told you that?
A No.
Q Okay. Let's talk a little bit about what -- and I'm talking about the timeframe of October 2013 right now until December 2013. In your capacity as a watch commander in what way did you have any interactions with Mr. Gorman?
MR. MARTIN: Do you have the year right?
Q We're talking about 2012, excuse me. We're talking about 2012.
A Okay. I think John was a supervisor if I remember correctly. So he would've been the supervisor assigned to my shift.

Q All right. So you had said -- you had indicated that there were sergeants that work underneath you. Would Mr. Gorman have been one of those sergeants?
A Yes.
Q Isn't it also true that you are a training supervisor as well?
A I was an FTO, yes, field training officer.
Q Okay. And were you training Mr. Gorman? Were you his training supervisor?
A I think I was. I'm not 100 percent sure. I believe I was.
Q Okay. Why do you not know if you were or not?
A I don't remember if I trained John or not. I know he was assigned to my shift. I don't remember if I was his field training officer.
Q What does a field training officer do?
A Usually someone is assigned to you and you show them how to do the job.
Q Do you recall showing Mr. Gorman how to do the job?
A Yes.
Q And how long did you do that type of training?
A I think usually with a supervisor it's like one or two weeks with someone assigned with you.
Q And do you recall having that training with

Mr. Gorman?
A I don't remember. I know he was assigned to my shift, and as part of one my sergeants on my shift I would've helped train him. I don't remember if he was assigned with me specifically during that time period.
Q Okay. Now, do you recall an incident involving Mr. Gorman and the use of an auxillary firearm?
A Yes.
Q When do you recall to the best of your recollection when that happened?
A I don't remember. I don't remember dates of when it happened.
Q And what do you remember of that event?
A I remember John did a transport and I think the issue was that the weapon wasn't signed in when it was returned, if I remember correctly.
Q Okay. And did you file that complaint?
A I think I did. But without seeing it, I can't remember if I did the paperwork on that or not. I didn't initially find it, but I believe I did the information or the writeup for it.
Q Did you also deliver it to Mr. Gorman?
A I don't recall if I did or not.

Q Did you have any discussions with a Sergeant Maselli regarding that event?
A Before the event or during or...
Q Well, after the event.
A I don't remember if I did or not.
Q All right. Was the alleged violation observed by you or some other witness?
A It was brought to my attention by the captain, Captain Smith.
Q Okay.

MR. SORSBY: Kevin, I'm going to introduce this as an exhibit. Do you want copies real quick first?

MR. MARTIN: Sure, if you could.

MR. SORSBY: I'll be right back. We can go off the record for a moment.

(Whereupon, there was a short recess in the proceedings.)

(Plaintiff's Exhibit 1 was marked for identification.)

BY MR. SORSBY:
Q So we're back on the record. I'm going to show you what's been marked as Plaintiff's Exhibit 1. Take a few seconds to look that over if you need to.

(Witness examines document.)

Do you recall signing what's been marked as Exhibit 1?

A Yes.

Q All right. Do you see where it says "Offense Observed/Reported By"?

A Yes.

Q What's the name --

A Sergeant Maselli.

Q Okay. Do you now remember who brought this report to you?

A Yes. I believe the captain was talking about that he was going to have to do a writeup and I said I would do it for him.

Q Okay.

A And I guess it must've been reported to him by Sergeant Maselli.

Q So did you talk to Sergeant Maselli in regards to this complaint?

A I don't remember if I did or not. I know the captain was talking about that he was going to have to do the writeup for it and I said I would do it for him since I was the watch commander.

Q All right.

A And it must've been that Sergeant Maselli must've reported it to him.
Q Okay. And do you see where it says "Warning given by," is that your signatures?
A Yes.
Q So do you recall giving this to Mr. Gorman?
A Yes.
Q All right. We're done with that for now.
Just a real quick question. Does this Exhibit 1, is this -- this is normally -- this normally has an informational affixed to it; correct? It's normally not like this. There's another document that usually goes with this; isn't that true?
A It could. It could. It may not always, but it could have an informational that goes with it.
Q Do you know what an informational is?
A Yes.
Q Can you tell us what it is?
A It's a report, a written report about the incident.
Q All right. Is it standard procedure that the informational goes with an incident report like this?
A I don't know -- I haven't always gotten an

informational with all of these.
Q All right. Do you recall having a conversation with Mr. Gorman in regards to Mr. Patricelli making attempts to write Mr. Gorman up?
A I don't remember having a conversation. No.
Q Do you have any knowledge as to whether or not Master Sergeant Patricelli had attempted to have Mr. Gorman written up?
A Not that I know of.
Q Okay. Now, in your capacity as watch commander did you have an occasion to do a work appraisal report for Mr. Gorman?
A Yes.
Q And how many do you recall giving?
A I couldn't give you a number of how many. I don't know.
Q All right. How did the appraisals -- how were the appraisals generally for Mr. Gorman?
A I think they were very good.
MR. SORSBY: I'm going have this marked as an exhibit. Mr. Martin, I think what I'll do is have it marked first and then I'll make a copy so you can keep the number on there.
MR. MARTIN: Sounds good.

MR. SORSBY: Off the record for a minute and get some things marked.

(Plaintiff's Exhibits 2 and 3 were marked for identification.)

BY MR. SORSBY:

Q Back on the record. My secretary may come in with the other documents, but we'll keep going here.
I'm going to show you what was marked as Exhibit Number 2. Do you recognize this document?
A Yes.
Q How do you recognize this?
A It's a performance evaluation.
Q And can you see who the performance evaluation is of?
A John Gorman.
Q Is this something that you filled out?
A No.
Q Okay. Is this something that -- is this the type of evaluation that they typically fill out at the jail?
A Yes.
Q Do you recognize the names on the front of the paper, some of these sergeants that are listed on it?
A Yes.

Q Okay. I'm going to actually -- so what I'm going to do is I'm going to show you Exhibit 3, I don't have any further questions on that, and have you take a look at Exhibit 3. Do you recognize this document?
A Yes.
Q And how do you recognize this document?
A It's the same thing, performance appraisal, evaluation.
Q And whose the evaluation of?
A John Gorman.
Q Is this something that you prepared?
A Yes.
Q And can you tell us the timeframe of this evaluation?
A October 1, 2012 to February 15th, 2013.
Q Well, actually notice there appears to be two performance appraisals in here towards the back of it. So the first one goes one through page, looks like six, and then there's a couple of pages attached and then there's a new page one. Do you see that?
A Yes.
Q So you did, yourself, did two evaluations of Mr. Gorman?

A Yes.
Q Okay. It looks like the dates of these two evaluations overlap a bit. Do you see that?
A Yes.
Q Can you tell us -- do you know why that might be?
A The first part is for correctional sergeant and the second one is for correctional officer.
Q Okay.
A So I believe that's the time when John went back from being a supervisor back to an officer.
Q And do you know why he went from being a sergeant to being an officer?
A Because he was provisional. He was provisional, and then the new test grades came out and other people were promoted and he was put back to officer.
Q All right. These are a lot -- there are a lot of pages in these evaluations.
A Yes.
Q Were both of the evaluations satisfactory of Mr. Gorman?
A Yes.
Q All right. In fact, isn't it true if you read the last page of the provisional sergeant evaluation in there you state, "It was a pleasure to have worked

with him in the capacity of a supervisor. I feel he was doing a very good job"?
A Yes, yes.
Q All right. Well, we're done with that. I think your evaluation speaks for itself.
A Okay.
Q Do you know who Thomas Hendry is?
A Yes.
Q And how do you know Mr. Hendry?
A As I think he's Human Resources.
Q For...
A For Rensselaer County.
Q Okay. And have you spoken to Mr. Hendry in regards to Mr. Gorman at all?
A Yes.
Q When was the first time you spoke to Mr. Hendry about Mr. Gorman?
A I don't remember when I spoke to him. I think he came down to the jail once and asked me a question I think about if I've ever witnessed workplace violence. I think that's all I ever spoke to him about.
Q Okay. And what was your response to Mr. Hendry?
A No.

Q That you had never seen workplace violence period?
A Right. If I had seen an incident of workplace violence and I said no.
Q Okay. Did a discussion come up with Mr. Hendry about the allocation of assignments to Mr. Gorman in regards to whether those are punitive or not?
A I don't recall a conversation about that with him.
Q Okay. Now, you said he came down to meet you in person?
A Yes.
Q Was he taking notes at that time?
A I think so.
Q Okay. Did you say anything in regards to Mr. Gorman's performance as to whether or not he was a good officer, et cetera?
A I don't remember the conversation with him.
Q Okay. Do you have any knowledge about the set up of videos in the secured portion of the jail, video cameras, surveillance systems?
A Yes, a little bit.
Q Tell us about what you know.
A I know there's a couple of systems throughout the jail. They have monitors and you can see the videos of goings on at the jail. You can use it to burn CD

recordings if you need to of incidents that happened. There's two separate systems.
Q Two separate systems?
A Well, I guess it's one system. There's one main system in the control room, then there's like a couple of satellite systems where people can monitor what's going on or review videos, burn CDs.
Q Okay. So does anybody have access to these cameras?
A Now or...
Q I'm talking about -- for all relevant times I'm talking about the time in question. So we're talking about 2012.
A Yes.
Q Anybody has access to the cameras?
A Well, not anybody. Certain people have access to cameras. Yes.
Q And do you recall during that timeframe what certain people?
A I think Captain Hal Smith, Lieutenant Karam, Tony Patricelli and I believe Chief Vibert.
Q Did you have access?
A I didn't have it in my office, no.
Q Okay. And just for the layperson's sake, access to the cameras means access to the video control room?

A There's a main control room that has video for the whole jail. There was like, I guess for like lack of a better term, satellite things where there was computer with monitors in different offices, captain's office, chief's office, Patricelli's office, Karam's office. They had like their own separate viewing station.
Q All right. Now, the main camera room, the main control room, who has access to that room?
A The control room officers, supervisors, any officers who go in there to do reliefs or go into control.
Q And that room is that staffed by more than one person?
A Staffed by two people. Yes.
Q Two people. At all times?
A Midnights there's one person.
Q Okay. In the main control room, and again 2012, did staff have the ability to control cameras?
A Yes.
Q So they can change the position of the camera?
A There are certain cameras that are called PTZ cameras, and they can be moved from any of the stations.
Q Okay. So the main control or the satellite control?

A Yes.
Q All right. Now, the satellite control rooms, these are rooms within these senior individuals, in their offices? So like there'd be a satellite office, video control in Patricelli's office and Karam's office?
A It would just be a separate computer system in their office.
Q Okay.
A There's two that can open doors; visitation control and control. They can open doors. The other stations you can't open doors from. You can just view, view the cameras.
Q Okay. So you're saying in some of these satellite offices you can control who enters and who exits the jail?
A Yes. Well, the two -- sorry. The two -- the main control room and the visitation control room are the only two you can.
Q All right. But not the individual satellite offices like Patricelli?
A Correct.
Q Okay. Can you tell us where, as the watch commander, where in the secured facility is your

office?
A Basically the center.
Q The center?
A Right next to the main control room.
Q Okay. And where is your office in relation to Master Sergeant Patricelli's office?
A My office is near the center, his office is near the front entrance of the jail.
Q Is his office in the secured facility?
A No.
Q It's not. Okay. And just to give me some background, the secured facility is one building, just one standalone building?
A The one building is one standalone building. Yes. The secured part is where the inmates are.
Q Okay.
A Then you have the offices, administration. The administrative offices is the unsecured area of the jail.
Q And is that -- so is that detached from the secured facility?
A No. It's connected.
Q It's connected?
A Yes.

Q All right. Let's go a little bit forward in time to April of 2013.
A Okay.
Q Did there come a time when you had a discussion with Mr. Gorman in regards to him needing permission from you before he went somewhere in the jail?
A It wasn't permission. It was to let me know where he was going to go so I knew where he was going to be.
Q Okay. When did you have that conversation with him?
A I think it was shortly after he came back in to be an officer in the jail.
Q Do you remember when that happened?
A Probably on that -- probably says that on that evaluation when he came back as being an officer.
Q Actually, just for clarification. If we look at Exhibit 3 real quick, I'll come back to this line of questioning, I was just noticing, you can look at the appraisal, I think there's just a clerical error or a misunderstanding on my part. The date on that says February -- as a correction officer it says February 2012. Was that supposed to be February 2013? Do you see that? Because he was --
A Yeah, it must've been.

Q Because he was a provisional from 2012 October to February 2013; right?
A Must've been a clerical error. Yes.
Q All right. So sometime after he went back to being a correctional officer, which having read that do you think that was after or in February 2013 that he went back to being a correction officer?
A Yes.
Q All right. Now, why is it that he needed to talk to you before he went somewhere?
A Well, John at the time was -- he came back in the jail and he was assigned to a relief officer post. John also did an extra duty, which was worked on the keys in the facility, the keys and the locks. So when John had free time or time that wasn't accounted for in his schedule he would go work on keys. So I had told him to let me know when he's going to go work on keys so I know where he is. And if anybody was looking for him, then I would know where he is.
Q Okay. Can you tell us if there was a workplace violence policy in place in 2012-2013, this time in question, at the facility?
A I believe there was.

Q Okay.
A There is now. I know there is now. I believe there was at that time.
Q I'm going to get to that. I just want to back up. You had said earlier, I had asked you about who has control of the video cameras, and you said people had control then. What's the control of video cameras now? Has that changed? Was there a change?
A People have changed, so yes, it has changed.
Q Okay. The staff that has access has changed?
A Yes.
Q Okay. I just wanted to clarify that.
What did you understand the workplace violence policy to be at that time?
A I don't remember what it was at that time. I imagine it was the same then as it is now.
Q Now, you were the watch commander, you were a supervisor. Did you have any supervisory training?
A Yes.
Q Do you recall what that training was?
A Not all of it. It was a long time ago. But it was -- I know there was evaluations and stuff like that in the training.
Q Were you given training on workplace violence?

A I'm sure we were then. Yes.
Q You're sure you were. Do you know if you were?
A I don't know in fact if I was then.
Q Were you given training on recognizing discrimination based upon disabilities, violations of The Americans with Disabilities Act, things of that nature?
A I don't know if in fact I was at that point.
Q Based on your training what did you understand the policy to be at the jail for reporting acts of discrimination?
A I believe it would be reported to me and then forwarded up the chain of command up to the captain.
Q Okay. Are you aware that Mr. Patricelli had called Mr. Gorman and threatened to break his jaw?
A I've heard about it.
Q And when was the first time you heard about that?
A I don't recall when I first heard about it.
Q Did you have any discussions with any staff at the jail in regards to, other than Mr. Hendry, in regards to allegations of workplace violence against Mr. Gorman?
A None that I recall. Possibly if I did have any it would've been with Captain Smith and Ruth Vibert,

who was the chief at the time.
Q What conversation did you have with Vibert in regards to Mr. Gorman's workplace violence allegations?
A I don't remember a specific conversation with her about it.
Q Isn't it true you had a phone call conversation with Ruth Vibert about Mr. Gorman's allegations?
A I don't remember that.
Q Okay. Do you recall being made aware that Mr. Gorman had an order of protection against Mr. Patricelli?
A I do remember that happening. There was an order of protection at some point.
Q All right. Who told you about that?
A I don't remember who told me that.
Q Okay. Were there any instructions given to you by your supervisors in regards to ensuring that Mr. Gorman was kept safe from Mr. Patricelli or to stay away from Mr. Patricelli?
A I don't remember any specific instructions about it. No.
Q Okay. In your capacity as the watch commander have you ever been informed one of your staff has an

order of protection against another staff other than Mr. Gorman?
A I don't think so.
Q What did you understand the policy to be if one of the workers that are underneath you, one of the corrections officers that you're supervising has made a threat of violence against another coworker, what are you to do? What have they instructed you to do in that regard?
A I would've -- at that point I would've forwarded him up to the captain and talk to the captain.
Q Do you recall giving testimony at a workers' compensation hearing regarding Mr. Gorman?
A Yes.
Q Do you recall what year that was?
A No.
Q Can you tell us when is the first time you met Master Sergeant Patricelli?
A Probably in 1997 when I started.
Q Did you know him outside of the work environment?
A I didn't hang out with him. No.
Q Okay. You said you had a number of people that you're responsible for. Are there other individuals that you have come to you and inform you as to where

they're going and what they're doing, or was this abnormal that you would have Mr. Gorman --
A John was the only one that was assigned to a special detail besides his normal job duties.
Q And that was what detail?
A Working on keys. Key detail.
Q And he had to inform you. But he had to inform you wherever he was going; correct?
A Not all day, no. If he was going to go work on that assignment I told him to let me know when he was going to do it so I knew where he was going to be.
Q Okay. Did you happen to see any interactions with Mr. Patricelli and Mr. Gorman?
A Not that I can recall. No.
Q Do you recall Master Sergeant Patricelli discussing or telling you that Mr. Gorman is spending too much time in Dunham's office?
A Yes.
Q Okay. When did he tell you that?
A I couldn't give you date. I don't remember when that was. I remember him saying that he was spending an awful lot of time in Dunham's office.
Q And how did he tell you that? Did he tell you that over the phone or did he come down and tell you?

A I don't know. I don't remember how he told me or when he told me.
Q How did you respond to that?
A I don't remember.
Q And when he told you he was spending too much time in Dunham's office, that was before you told Mr. Gorman that he has to tell you before he goes somewhere; is that true?
A It could have been. I don't remember.
Q Okay. And where is Mr. Dunham's office in relation to your office?
A At the time?
Q Hm-hum.
A We've moved a few times, so I'm trying to think of where he was then. I think he was in the central hallway near where my office is now, in the middle of the jail.
Q Okay. So his office was not next to Patricelli's office; isn't that true?
A Correct.
Q And for Petricelli to get to your office or Dunham's office he had to walk down the hall; correct?
A Yes.
Q Okay. And how far would you say Patricelli's office

is from your office?
A Probably 100 yards.
Q And Mr. Dunham's office, does he share that with anybody else as far as you know, or did he share it with anybody else?
A I don't think at the time.
Q Tell us for the record who Mr. Dunham is. What is his role in the chain of command? What was his role at that time?
A He was the sergeant at the time I believe.
Q All right.
A And he was in charge of like the transition detail, transitioning from the old jail to the new jail with the expansion project.
Q Now, you said that Patricelli had a satellite camera office; correct?
A In his office.
Q In his office. Okay. How did -- Patricelli came to you and said he was spending too much time in Dunham's office. How would he know that Mr. Gorman is spending too much time in Dunham's office?
A Whether he saw him there, saw it on video, heard phone or somebody calls on the radio and asks where you are and you say you're at this extension.

There's different ways.
Q So Patricelli has a camera in Dunham's office?
A Not in Dunham's office. He has his camera set up in his office so he can view all the cameras in the jail.
Q Right. So is there a camera on the approach to Dunham's office?
A There's a camera in that hallway.
Q Okay. But do you know if there's a camera in Dunham's office?
A Not in the office, not that I know of anyways.
Q Okay.
(An off-the-record discussion.)
BY MR. SORSBY:
Q Can you tell us what, if any, steps you took once you found out there was an order of protection against Patricelli for Mr. Gorman to keep Patricelli away from Mr. Gorman?
A I don't remember any specifics steps.
Q Okay. Do you recall at the workers' comp hearing, the one we just discussed before regarding Mr. Gorman, you were asked did you get the impression that Patricelli is watching Gorman and do you recall saying yes?

A I don't recall what my answer was.
Q The additional question was, "Why did you get that impression that Patricelli is watching Gorman?" And he said, "Because he told me that he was spending a lot of time in Sergeant Dunham's office."
A Okay.
Q Do you recall saying that?
A I don't recall. But if it's there, then I said it.
Q Well, we'll get this -- I'm going to go off the record for a moment.
(Whereupon, a discussion was held off the record.)
(Plaintiff's Exhibit 4 was marked for identification.)
BY MR. SORSBY:
Q Back on the record.
So as you indicated earlier you recall being at a workers' compensation hearing, and we've marked -- when we were off the record we marked pages from a transcript from that hearing as Plaintiff's Exhibit 4. So I'd like to direct your attention to page 20. So if you look part way down it says, question:
"Q Okay. Did you get the impression that

Patricelli was watching Gorman?"
Do you see what your answer was?
A Yes.
Q Okay. And then you see the next question:
"Q Why did you get the impression Patricelli was watching Gorman?"
Do you see what your answer was?
A Yes.
Q What did you say?
A "Because he told me that he was spending a lot of time in Sergeant Dunham's office."
Q Now, explain to me, if you will, Master Sergeant Patricelli's role in the chain of command?
A He was a First Sergeant.
Q Okay. And did he report to you?
A No.
Q Did you report to him?
A No.
Q Okay. And did Mr. Dunham report to Master Sergeant Patricelli?
A No.
Q Okay. Did Mr. Gorman report to Master Sergeant Patricelli?
A No.

Q Did Mr. Gorman report to you?
A Yes.
Q So what did Sergeant Dunham -- what are some of the things -- what role he did play at the jail? I mean what was he tasked with? Was he a supervisor?
A Yes.
Q Okay. And what was he tasked with?
A He was tasked with the transition and the construction of the new jail. That's what his duties were.
Q Okay. Still trying to -- maybe you can help me. Master Sergeant Patricelli he did not -- if you didn't report to him, explain to me where up in the chain of command he fit?
A I guess a First Sergeant is I guess higher than the Sergeants. But he was really assigned to like security, security risk, gang detail. That's was his assignment -- his assignment was.
Q Okay. And Sergeant Dunham was he in any way involved in the key detail?
A Yes.
Q What role he did play in that?
A He would've probably supervised John as far as working on that detail. The key detail kind of went

hand in hand with the expansion project, which Dunham was in charge of.
Q Okay. So would it make sense that Sergeant Gorman -- or Correction Officer Gorman would be in Sergeant Dunham's office?
A Yes.
Q Okay. Why would Anthony Patricelli be in Sergeant Dunham's office to observe Mr. Gorman being in there all the time?
A Why would he be in there?
Q Right.
A I have no idea.
Q Do you know if Patricelli was involved in the key detail?
A I don't believe so.
Q What did you tell Patricelli when he told you that Gorman was spending a lot of time in Sergeant Dunham's office?
A I don't remember.
Q Did you say anything to him?
A I don't know.
Q Did you think it was a problem that he was spending a lot of time in Sergeant Dunham's office?
A No. I didn't think it was a problem, no. The only

issue would've been he was a relief officer at the time.
Q Who was?
A I believe it was at the time Officer Gorman.
Q Was a relief officer?
A I believe he was a relief officer at the time, which had other duties in the jail.
Q Okay.
A And as part of his extra detail he was working on the key detail. He would go from his program spot and he would go out and work, working on keys.
Q All right.
A So other than to say that he was out there a lot, I don't see any other reason to say it.
Q So why did you instruct him that he had to tell you before he went on the key detail? Was it in response to what Patricelli was telling you about him being in Dunham's office all the time?
A I don't think so. It was because he was a Programs officer, which is assigned to in the jail. So now he's going to do another detail, so I can know where he is and what he's doing at that point. If we need him for escorts -- part of the relief officer's jobs is doing shakedowns, which is cell searches for

inmates, escorts, other things that happen during the course of the day.

Q Okay. Can you turn to page 21? I'm going to read your answer to a question. It says -- well, I'll do it justice. The page before it says, question:

"Q Okay. So if there's nothing wrong with spending time in Dunham's office, why would Patricelli come to you and express a concern that Gorman was spending time in Dunham's office?"

Your answer:

"A He's done that to me with a few people, people out front smoking when they are not doing something, he was concerned he was not doing what he was supposed to be doing. But I knew John was doing keys when he was out there, so I told John to let me know when he was going to be on key detail so that if anyone had a problem with it, I'd say yeah, I told John to go do the keys.

"Q Okay. And why would you perceive that there might be, using your terms, problems with it?

"A If anybody was saying that he's not doing what he's supposed to do."

Did somebody tell you he was not doing what he was supposed to be doing?

A No. I just -- they said he was out there, spending a lot of time in Dunham's office.
Q And that was Patricelli?
A Patricelli.
Q Okay. When Mr. Patricelli told you that Gorman was spending too much time in Dunham's office, did he indicate that he saw Mr. Gorman on the video?
A I didn't know how he knew.
Q All right. Are there -- under your control are there other staff members that have duties outside the secured facility such as the key detail?
A At the time, no.
Q John was the only person that you were supervisor of that --
A Well, John had the special detail of doing keys also. He was assigned to it when he was supervisor. And then when he came back in we still kept him on the detail.
Q There are no other special details at that facility at that time?
A I'm trying to remember if there was. There may have been people assigned to the transition team, which may have been assigned to Dunham also.
Q Okay. And those people were underneath you as well,

were they not?
A They would've been assigned to Dunham, Lieutenant Dunham. That would've been his people for that project.
Q So there was nobody under you in your role as a night -- go ahead.
A There would've been some special post like classification officer.
Q And that person would leave the secured?
A Well, no. They would stay in the secured.
Q But they would go to some other detail other than --
A Not really, no. That would be their assigned detail. That was their full-time detail.
Q All right. And generally what does staff do when they're not performing their normal duties?
A They're supposed to be available if we need them. They may do shakedowns, they may do sit in the hallway, they may sit there and talk to another person that's next to them. They're to be available in case of an emergency or we need them for something.
Q Okay. Do you instruct them for them to tell you where they're going to be?
A If they're going to be doing a special detail or

something I should know about it.
Q Okay. And then -- but otherwise, if there's no other special detail --
A Otherwise, no.
Q All right. Has there been other staff other than Mr. Gorman when you were the watch commander that had special details?
A Not that I can remember.
Q Is Mr. Gorman the first person that's had a key detail?
A Yeah. As far as I recall, yes.
Q And then other than Mr. Gorman there's been no other staff members that have had special details?
A There has been. They've been assigned to transition team. Is that what you're asking?
Q Under your command as the Watch Commander, in your time as a Watch Commander, you were a Watch Commander for how many years?
A Probably three, maybe four years.
Q And during that time there were no, other than Mr. Gorman, no other staff members that had special details?
MR. MARTIN: Under him?
Q Under him, correct.

A I don't recall any of them.
Q Let me narrow down the questioning. Other than Mr. Gorman is there any staff member in your time as the Watch Commander that had to get permission or to instruct you where they were going?
A Not that I can recall.
Q Okay. And did anybody at the facility, at the jail instruct you to have Mr. Gorman indicate where he was going?
A No.
Q Okay. To the best of your recollection did there ever come a time when Mr. Gorman didn't do his job?
A No.
Q We're getting close.
A Okay.
Q I'm sure everybody is getting hungry.
Let's fast forward to June 2013. Now, there came a time when Mr. Gorman came to you and got permission to go speak to Undersheriff Russo; isn't that true?
A I believe so, yes.
Q And did you grant that request?
A I believe I did.
Q And do you believe that was in the timeframe of

June 2013?
A I don't remember the timeframe.
Q I'm going to direct your attention back to the same exhibit that we've been talking about, and this is Plaintiff's Exhibit 4. We're on page 24, just to kind of refresh your recollection here. And again, this is that transcript from the Workers' Comp hearing. You see the second -- well, second question.
"Q Okay. Did there come a day in June 2013 when Mr. Gorman returned from a meeting with Undersheriff Russo and Mr. Gorman appeared visibly upset?
"A Yes.
A Yes.
Q Okay. You recall that incident?
A Yes.
Q Okay. And what about his appearance made you believe he was visibly upset?
A He seemed shaken. He might've cried when he came in the office.
Q And what, if anything, did he tell you?
A I think he was worried about losing his job. I don't remember the whole conversation.

Q Okay. He said something about losing his job, you recall that?
A I think. It was either the losing the job or the promotion, the supervisor thing. I don't remember exactly what it was about.
Q Okay. And do you remember what, if anything, you told him?
A No.
Q Before I go on, I have a follow-up question in regards to the -- bear with me one second. I have to see which exhibit, Exhibit 1. Do you recall me showing you what's been marked as Plaintiff's Exhibit 1, the oral warning record?
A Yes.
Q Okay. Do you recall seeing that the observation, the witness was Sergeant Maselli; right?
A Yes.
Q And isn't it policy -- it was policy then, it's policy now when a complaint -- when there's an oral warning given to a correction officer, that it can't be a naked complaint. Meaning if there's a witness observation there has to actually be a sworn in -- a statement, an informational statement as part of that complaint. Isn't that true, isn't that the

sheriff's department policy?

MR. MARTIN: Object to the form.

Q You can still answer the question.

A I'm not sure.

Q You don't know the policy regarding the giving of oral warnings?

A Well, we did this and I think there was a -- there was a logbook that wasn't filled out properly. So I don't know what informational or I would need with that. I mean I think that probably would've been attached to it as the evidence to what happened.

Q Okay. A statement could've been attached, is that what you're saying?

A Could've been. I would think it would.

Q Do you recall if you took a statement from Mr. Sergeant Maselli in regards to this?

A Not a statement, but a copy of the logbook that wasn't filled out, the weapons log.

Q All right. Now, again I just want to look at Exhibit 1. Do you see where it says Warnings Given By, and it has a signature there. That's your signature?

A Yes.

Q So you gave this warning to Mr. Gorman, didn't you?

A Yes.
Q All right. How did you warn him about the weapons log issue if you didn't have a statement from Sergeant Maselli? I mean you didn't do this with personal knowledge, did you? I mean this is based on his observation, not your statement, your observation, is it?
MR. MARTIN: Object to the form. You can answer if you can.
A I believe I talked to the captain about it. He was the one that mentioned to me about it and I told him I would take care of the writeup for him. As far as -- I don't know that I needed anything, a written statement from him, if I had the logbook that wasn't properly filled out.
Q Okay. But you don't recall if you attached the logbook to this page?
A I don't recall.
Q And again, Sergeant Hal Smith, right?
A Captain Hal Smith.
Q Captain Hal Smith?
A Yes.
Q He was going to do this. You did it for him. Did he tell you he had firsthand knowledge of this

incident?
A I believe he told me that Maselli brought it to his attention. That's why I would've put Maselli observed it.
Q Okay. Observed report -- or I got you. Reported by. Got you.
Okay. So where was Sergeant Maselli in the chain of command vis-a-vis Mr. Gorman, do you know?
A Sergeant Maselli would've been the watch commander when I wasn't working.
Q Okay.
A He would've been another sergeant on a day shift.
Q Can you tell us what, if any, policy there is regarding the logbook that you were mentioning?
A Policy? There's supposed -- well, what they're supposed to do is they're supposed to have a supervisor or the watch commander sign the weapon out. And also when they return it they're supposed to sign the weapon and check it back in.
Q Who's supposed to sign to check it back in?
A The watch commander or supervisor.
Q And is this a written policy?
A I'm not sure. I'm not sure if it's in writing.

Q Now, I want to just bring you back to this. It says, "On November 5th, 2012 Sergeant Gorman returned the keys for his auxillary weapon without having it signed in by the watch commander." That was -- it's not a reference to you, right? That would've been a reference to the watch commander himself; correct?
A Whoever the watch commander was that day. I don't know who the watch commander was on that day.
Q Okay. I'm just trying to figure out. If you're issuing the complaint against him and it's based upon the allegation that the watch commander, which is not you you've indicated, didn't sign it in, wouldn't you talk to the watch commander that reported the violation?
A I could. But like I said, the captain was the one that had it at that point and I told him I would do it for him.
Q All right.
A So I could have talked to Maselli. I don't recall a conversation with Maselli about it.
Q What I'm trying to figure out is if you weren't the watch commander that observed that it wasn't signed in and you have no knowledge that this incident

actually happened, how it is that you can give him a warning based on that or even Hal Smith for that matter?

A Well, based on that the weapon wasn't signed back in in the logbook that's how you would know it wasn't done.

Q But without having it signed in by the watch commander, so you looked at the logbook and the watch commander hadn't signed it in, is that what you're saying?

A It hadn't been signed back in. Correct.

Q By the watch commander; correct?

A By anyone I don't believe.

Q All right. And do you recall looking at the logbook?

A I don't recall at this point.

Q All right.

MR. SORSBY: I'm going to take a two-minute break and wrap up and grab lunch.

(Whereupon, there was a short recess in the proceedings.)

BY MR. SORSBY:

Q Back on the record.

I just want to ask you a couple more

questions. Did Master Sergeant Patricelli ever come to you about other staff members not being where they're supposed to be?
A Yes.
Q And did he come to you often about that?
A Sometimes.
Q Is that his job to report to you people that are not supposed to be where they're supposed to be?
A No. I think he was doing it as a courtesy to let me know where people were.
Q Okay. And these people were your -- you were their supervisor?
A Yes.
Q All right. And when he called -- did he call you to tell you this or did he come down?
A I don't remember if he called me on the radio or he called me on the phone. I don't remember.
Q And you said this happened often. What were these people doing that they weren't supposed to be doing?
A Most of the time they were out front, out in front of the jail, out in front of his office.
Q Okay. They were out in front of his office?
A Outside smoking, yeah. For the most part, yes.
Q What did you tell him when he called and told you

this?
A I'll take care of it, I guess. I would talk to those people.
Q All right. Do you have some names of those people?
A Probably Dave Higgit, H-I-G-G-I-T. He was a sergeant on my shift.
Q Who else?
A Specific names I'm not sure.
Q But there were several people, is that a fair characterization?
A Yes.
Q One of the things I'm confused about is Master Sergeant Patricelli, these individuals were not under his control nor was he responsible for them in a supervisory capacity, isn't that true? You were; correct?
A Correct. He still is a supervisor.
Q Okay.
A So I guess you have some responsibility for that. But I am overall responsible for them.
Q All right. Do you have the same access to video cameras that he does to monitor your own staff?
A At that point, no.
Q Now, I just want to get an idea. In addition to

Dave Higgit do you have an idea about the numbers of people that he's called you about? Was it several times a year that he would call you?
A No. It was more often than that. Probably a couple of times a week.
Q Okay. It was a problem?
A People like to go out and smoke.
Q All right. And going out to smoke was that the only time that he -- those were the only incidents he was calling you about, or were there other instances where people weren't supposed to be where they were supposed to be?
A That's the main thing that I remember, is people being out front of the building, and whether they were smoking or whatever they were doing out front.
Q Did you instruct Mr. Higgit that he had to tell you where he was? Did he have to tell you where he was going?
A No. But I told them that they were only supposed to go out on their break times, that they weren't supposed to be out front.
Q Did you tell the other individuals that they had to tell you where they were going before they went somewhere?

A Not the normal Programs officers. No.
Q Was there somebody else that you told that --
A No.
Q All right. Are there other officers other than Program officers?
A Housing Unit officers who are assigned on a housing unit all day. So they shouldn't be going. There should be nowhere they can go.
Q Okay. Do you know who Sergeant Connel is?
A Yes.
Q Was he working there from 2012 to 2013 when Mr. Gorman was there?
A Yes.
Q Okay. Did Sergeant Connel talk to you about Mr. Gorman?
A About?
Q Did Sergeant Connel come to you and instruct you that Mr. Gorman had to come off his lunch and do some activities, do some work-related activities?
A He did say he needed him to do a delivery. I think it was about something, something to do with a delivery.
Q When you say a delivery, he came to you and told you that John had to do something with a delivery?

A I think John told me about it.
Q Okay. What do you recall John telling you?
A I think that Sergeant Connel had asked him to do a delivery.
Q Do you recall that Mr. Gorman told you that he had asked -- Sergeant Connel had asked him to come off his lunch and do that a couple of times?
A That day --
Q Yes.
A -- I think John told me that Sergeant Connel asked him to come off his break and then go do the delivery and then finish his break afterwards.
Q What's the delivery? Can you explain that real quick?
A There would be a -- in the kitchen a truck would pull up with say food on it, and they would have to go outside and supervise the inmates unload the truck or supervise the stuff coming into the jail.
Q And Mr. Gorman told you that Sergeant Connel instructed him to do that. Now, why wouldn't Sergeant Connel come to you to instruct one of your staff members to come off their lunch break?
A Because he was a sergeant assigned to the jail too. Like I said before, there was a watch commander and

three other sergeants. So in his capacity as a sergeant he could order somebody to do that.
Q Is it normal for the sergeant to order someone off their lunch break?
A If there's nobody available. He's got to get somebody to do it.
Q Okay. Wasn't it normal protocol for the sergeant himself to do the deliveries?
A Sergeants would help out at times to do it.
Q Didn't you understand that it was Sergeant Connel's duty to handle the delivery?
A No.
Q Okay. Do you understand that there are relief officers to take care of such things to the extent that somebody is on their break?
A Yes. But the people when they're on break they fill in -- they cover the Program spot. They're relief officers. The relief officers do the reliefs. So when they go to give somebody a break, that person takes their spot. So there's technically when everybody is doing breaks, there's nobody available. If there's a code or something happens, people on their lunch are to respond to the code and then make up their break afterwards, the rest of their break.

Q Okay. And I understand what you're saying. We're talking about a delivery though. We're not talking about a code; right?
A Right, right. No.
Q So this would you strike you as outside the normal procedure, would it not?
A No.
Q To take somebody off their break to have them do a delivery? We're not talking about a code. There was no code -- there's no allegation that a code was met.
A Right.
Q This is for a delivery?
A Right. Correct.
Q So it did not strike you as odd that Mr. Gorman would be taken off his break --
A No.
Q -- to do a delivery?
A No.
Q Does that normally happen?
A It doesn't happen very often, no, it doesn't.
Q It doesn't happen often?
A No, no.
Q Okay. Now, Sergeant Connel was he a relief officer

at that time?
A Sergeant Connel?
Q Yes.
A I believe he would've been a supervisor that day.
Q All right. If Mr. Gorman was doing a delivery, he's coming off his lunch to do a delivery, how would he also do the other officers breaks on the housing units? How could he do both?
A The breaks would be postponed. They'd be a little later. He'd go finish up the rest of his break when he's done doing a delivery or somebody else would have to cover the break, or pick up another break.
Q Okay. So you'd have to move all the breaks around?
A You could shift one.
Q Okay.
A I don't know how big a delivery it was. I don't know how long it was going to take.
Q Right. Do you know what the delivery was?
A I have no idea.
Q Is there -- I'm having trouble understanding. Is there a reason why the delivery had to be at that moment when you were short staffed like that?
A I don't know that we were short staffed. I just think it was a break time. I don't know what the

delivery was.
Q All right. Isn't it true the delivery could've been done later in the afternoon after everybody was off their break?
A Like I said, I don't know what the delivery was. If the truck was there then, I would get the delivery done then.
Q Okay. Is the -- and again, a layperson. Is the jail so short on supplies that the delivery has to be done at that hour? What goods do you have delivered there? Food, products?
A Food products, paper products, supplies.
Q And is it not part of the jail's policy to have enough food and supplies to last more than a day?
A We have more that'll last more than a day. Yes.
Q So isn't it fair to say that the delivery could've been done in the afternoon without the jail shutting down?
A Without the jail shutting down? Yes, it could've been. But the truck was there then, so we did the delivery then.
Q I understand.
A I mean if I have a truck out there I try to get the delivery done as soon as possible. I'm not going to

take somebody in the middle of biting their sandwich and they can go do it. But if they're done eating their lunch then they can go help out and finish up whatever they have to do after that.

Q And I'm just trying to understand again when somebody's -- I understand taking somebody off their break if there's a code red or a code whatever and people are needed in an emergency situation. But I was having difficulty understanding why you take somebody off their lunch for a delivery that can be done at any point, and I think we covered that.

So just one final question here. When Mr. Gorman came to you and he indicated Sergeant Connel asked him to come off of his lunch break, what did you tell him about -- how did you respond to that?

A I think I told him to do the delivery and finish his break after that. I don't remember anything other than that.

Q Okay. You don't recall saying to him to be patient?

A No. I don't recall saying that.

MR. SORSBY: All right. Mr. Ranken, we are done. I will reserve the right to call you back once we get documents, one of which was directly relevant to your testimony. We may not bring you back. And I'll trying to bring you in in the morning so we can get you done before lunch.

THE WITNESS: Well, maybe after lunch would be better.

MR. SORSBY: Or after lunch.

THE WITNESS: Doesn't matter to me.

MR. SORSBY: But at this time I appreciate you coming out. I know you have an important job to do, so thank you for coming and maybe we'll see you again. Thank you.

THE WITNESS: All right. Have a good day.

- - -

(Whereupon, at 12:46 p.m. the examination of JEFFERY RANKEN in the above-entitled matter was concluded.)

- - -

(Exhibits were retained by counsel for plaintiff.)

C E R T I F I C A T I O N

I, DIANE DALY-GAGE, a Shorthand Reporter and Notary Public within and for the State of New York, do hereby CERTIFY that prior to being examined, the witness named in the foregoing deposition was duly sworn to testify the truth, the whole truth and nothing but the truth.

That said deposition was taken down by me in shorthand at the time and place therein named and thereafter reduced by me to typewritten form and that the same is a true, correct and complete of said proceedings.

Before completion of the deposition, review of the transcript was required. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not interested in the outcome of this matter.

Witness my hand this _______ day of _______________, 2015.

____

DIANE DALY-GAGE

CERTIFICATE OF OATH

STATE OF NEW YORK)
COUNTY OF)

I, Jeffery Ranken, hereby certify that I have read the transcript of my testimony taken under oath; that the transcript is a true and complete record of what was asked, answered, and said during the examination in the above matter, and that the answers in this transcript, as given by me, are true and correct, except for the changes and/or corrections indicated on the Errata Sheet attached hereto.

____
JEFFERY RANKEN

Subscribed and sworn to
before me this_________ day
of ______________________, 2015

____
Notary Public

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case name: John Gorman v. Rensselaer County, et al
Dep. Date: September 24, 2015
Deponent: Jeffery Ranken
Place: Albany, New York

CORRECTIONS

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Under penalties of perjury, I declare that I have read the foregoing document and that the facts state in it are true.

____

Date Signature

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